## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

AMNESTY INTERNATIONAL USA, CENTER FOR CONSTITUTIONAL RIGHTS, INC. and WASHINGTON SQUARE LEGAL SERVICES, INC.,

Plaintiffs,

٧.

CENTRAL INTELLIGENCE AGENCY, DEPARTMENT OF DEFENSE, DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF JUSTICE, DEPARTMENT OF STATE, AND THEIR COMPONENTS,

Defendants.

**ECF CASE** 

07 CV 5435 (LAP)

**NOTICE OF MOTION** 

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction Compelling DOJ and the CIA to Complete Processing of Plaintiffs' FOIA Requests, and attached declaration and exhibits, Plaintiffs Amnesty International USA, Center for Constitutional Rights, Inc., and Washington Square Legal Services, Inc., shall move before the Honorable Loretta A. Preska for preliminary injunction in the above-captioned action.

Respectfully submitted,

Gitanjali S. Gutierrez (GG-0122)

Emilou MacLean (EM-0121)

Shayana Kadidal (SK-1278)

CENTER FOR CONSTITUTIONAL

RIGHTS, INC.

666 Broadway, 7th floor

New York, NY 10012

Tel: (212) 614-6485 Fax: (212) 614-6499

Email: ggutierrez@ccrjustice.org

Attorneys for Center for Constitutional Rights, Inc.

Margaret L. Satterthwaite (MS-3953) Martha Johnstone (MJ-0979) WASHINGTON SQUARE LEGAL SERVICES, INC. International Human Rights Clinic 245 Sullivan Street New York, NY 10012

Tel: (212) 998-6657 Fax: (212) 995-4031

Email: margaret.satterthwaite@nyu.edu

Attorneys for Amnesty International USA and Washington Square Legal Services, Inc.

Dated: July 18, 2008

TO: Jeannette A. Vargas

Brian M. Feldman

Assistant United States Attorneys

Emily E. Daughtry

Special Assistant United States Attorney

86 Chambers Street, Third Floor

New York, NY 10007 Tel: (212) 637-2000

Fax: (212) 637-2730

Email: Jeannette. Vargas@usdoj.gov